September 29, 2010

Removal Action - Bi-Weekly Progress Report No. 6 Standard Chlorine Chemical Co. Inc. Site Kearny, New Jersey

BI-WEEKLY PROGRESS REPORT NO. 6 (SEPTEMBER 15 –SEPTEMBER 28, 2010) STANDARD CHLORINE CHEMICAL CO. INC. SITE REMOVAL ACTION KEARNY, NEW JERSEY

I. <u>Actions Taken Toward Achieving Compliance With the Agreement and Order During the Reporting Period</u>

The Contractor (Nova Development Group (NOVA)) mobilized on Monday September 13, 2010 and initiated site preparation activities. The next day, NOVA began installing wooden frames on windows in accordance with the procedures described in the Work Plan for Closure of Building Openings (work plan). Plywood sheeting was installed and secured to the frame work; the sheeting was painted to complete the closure. A summary of work completed to date is provided below.

Building 15: Twenty (20) windows out of twenty-two (22) total windows have been sealed as well as six (6) of the eight (8) doors. Nova left two small doors open to use this building for their decontamination set up in case of cold or rainy conditions. Painting was also conducted on the windows. (91% complete)

Building 17: Sealing of eleven (11) of thirteen (13) windows has been completed as well as eight (8) of the eight (8) doors. Nova closed the roof of building 17 and put proper signs on the assemblies pending the placement of the rubber cover (96% complete)

Building 18: Work was initiated on this building and sealing of one (1) window was completed. A Health and Safety review was performed to reiterate the proper protection equipment and decontamination procedures to work in this building.

Building 21: Nova sealed one door on this building and also closed both openings on the roof. (50% complete)

Every morning Nova held a Health & Safety tailgate meeting with the crew to discuss all the issues they had in previous days and review the plan and work to be completed that day.

II. Actions which are Scheduled for the Next Reporting Period (September 29, 2010 through October 12, 2010)

Closure of windows on Building 18 and 21 are anticipated to continue in accordance with the schedule. Also, the painting of windows on building 17, placement of rubber cover of roofs and closing of the remaining windows on building 15 is scheduled to be finished over next 2 weeks.



III. Other Information Relating to the Progress of the Work

Section 5.3.1 of the work plan details the installation of warning signs along the fence line and at the gates into the former process area. Most of the fence (75%), however, has been removed as part of the Interim Remedial Action Work. On September 13, 2010 during a site visit, Key and Ms. Staiger (EPA) discussed the issue and agreed to place the warning signs on the buildings. The signage specifications will be in accordance with the work plan.

During the work, soft surface materials to the east of buildings 15 and 17 caused accessibility problems. Nova requested the placing of fill around the buildings to make it safer and more stable as the soil around this area was so soft that it made it almost impossible to take the lift to these areas. WRSCompass placed the fill in the requested area and compact it to make create a more stable working surface.

IV. Schedule Considerations

The project is approximately 50% complete. Although there was an unanticipated delay associated with Contractor procurement, the Respondents are not requesting an extension to the overall schedule presented in the approved work plan. Barring any unforeseen delays with implementation of the construction activities, the Respondents and KEY believe that submittal of a Final Report on or before November 18, 2010, as shown on the work plan schedule, is currently feasible.

Pictures relating to the progress of the work are provided as Attachment A and the schedule is presented in Attachment B.



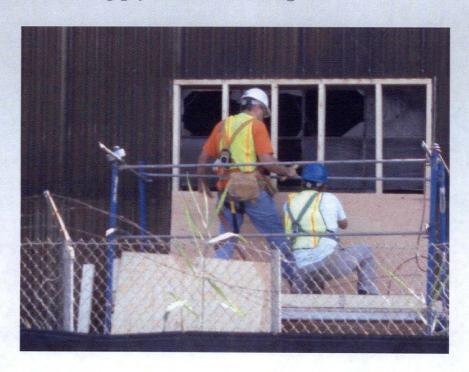
ATTACHMENT A Photos of Work



(Photo 1) Frames & Crossing beams - Building 15



(Photo 2) Installing plywood - Building 15





(Photo 3) Details on the frames & crossing beams - Building 15



(Photo 4) Sign on the fence around the work area





(Photo 5) Painted door - Building 17



(Photo 6) Transferring decon water from boot wash to the drum.

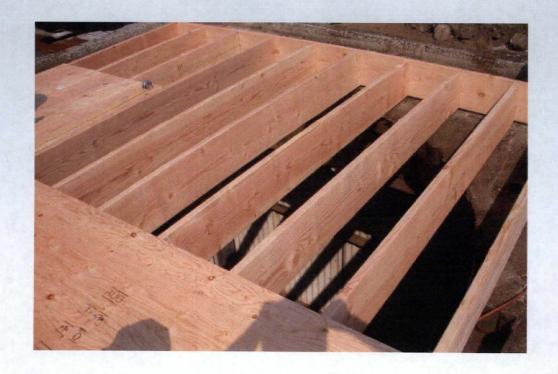




(Photo 7) Placing of fill around Buildings 15 and 17



(Photo 8) Roof Closure Frame - Building 17





(Photo 9) signs on the roof (pending placement of rubber seal).



(Photo 10) Secure the assemblies to the roof





ATTACHMENT B Project Schedule



FIGURE 4
PROJECT SCHEDULE
WORK PLAN FOR CLOSURE OF BUILDING OPENINGS
STANDARD CHLORINE CHEMICAL CO. SITE
KEARNY, NEW JERSEY 912 919 926 103 1010 1017 1024 1001 117 11/14 7/11 7/18 7/25 Work Plan for Closure of Building Openings 15 days 6/16/10 7/6/10 Work Plan Submittal 0 days 6/16/10 6/16/10 15 days 6/16/10 7/6/10 Work Plan Review Work Plan Approval 0 days 7/6/10 7/6/10 Administrative Tasks 61 days 6/7/10 8/30/10 Effective Date of Order 0 days 6/7/10 6/7/10 ◆ Identify Project Coordinator 5 days 6/7/10 6/11/10 Select Contractor 61 days 6/7/10 8/30/10 Notify EPA of Contractor 1 day 8/30/10 8/30/10 Work Tasks 49 days 8/31/10 11/4/10 Procure Equipment/Materials 10 days 8/31/10 9/12/10 5 days 9/13/10 9/17/10 Mobilization/Exclusion Area/Decontamination Area Health & Safety Meeting 1 day 9/9/10 9/9/10 Verify Warning Signs/Fence Condition 2 days 9/13/10 9/14/10 Clear Vegetation for Access 5 days 9/13/10 9/17/10 Close Building Openings 30 days 9/20/10 10/29/10 Sample Drummed Remediation 2 days 11/1/10 11/2/10 Decontamination/Demobilization 2 days 11/3/10 11/4/10 88 days 7/21/10 11/18/10 Reporting Tasks Final Report 30 days 10/8/10 11/18/10 Progress Reports 81 days 7/21/10 11/9/10 Project Summary External Tasks External Milestone